

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Lashawn Sharpe, individually and on behalf of all other similarly situated,

Case No.: 1:19-cv-00768 (BMC)

Plaintiff,

-against-

A & W Concentrate Company and Keurig Dr Pepper Inc.,

Defendants.

**DECLARATION OF
ANDREW GRANDA**

I, Andrew Granda, declare as follows:

1. I am the Principal Flavorist at the St. Louis, Missouri, concentrate manufacturing plant of Keurig Dr Pepper Inc., the parent company of A&W Concentrate Company.
2. On May 16, 2019, at the request of Steven Kramer, I took samples from two ingredients in inventory at Keurig Dr Pepper Inc.'s St. Louis manufacturing plant – Firmenich 2-Fold Vanilla Extract C28104 and Givaudan Natural Vanilla Flavor WONF #KM-668-925-6 – and labeled each sample with the appropriate Keurig Dr Pepper Inc. item number (20032412 for the 2-Fold Vanilla Extract and 34102564 for the Natural Vanilla Flavor WONF). That same day, I sent the labeled samples by FedEx (tracking number 453500491493) to Dana Krueger of Krueger Food Laboratories in Chelmsford, Massachusetts. I received confirmation from FedEx on May 17, 2019, that the samples had been delivered to Krueger Food Laboratories.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 17th day of December, 2019.


Andrew Granda